

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SUSQUEHANNA RADIO LLC**

**Plaintiff,**

**vs.**

**JACOB KEMP and DANIEL  
MCDOWELL**

**Defendants.**

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**CIVIL ACTION NO. 3:23-CV-01746-S**

**AGREED MOTION TO DISMISS WITH PREJUDICE**

Plaintiff Susquehanna Radio, LLC (“Plaintiff”) and Defendants Jacob Kemp and Daniel McDowell (collectively, “Defendants”) file this Agreed Motion to Dismiss With Prejudice, seeking a dismissal of the above-captioned matter, with prejudice, including all claims and counterclaims that were or could have been asserted in the lawsuit.

**I. BASIS FOR DISMISSAL**

Plaintiff and Defendants reached a full settlement of all actual and potential claims and counterclaims that were asserted or that could have been asserted in this lawsuit. Accordingly, Plaintiff and Defendants no longer wish to pursue this lawsuit and they are hereby requesting the Court to enter an order dismissing this lawsuit, including all claims and counterclaims that were or could have been asserted in the lawsuit, with prejudice to the refiling of same.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants request that Court enter the attached Order of dismissal and for such other and further relief as the Court deems appropriate.

Dated: September 27, 2023

Respectfully submitted,

**BAKER & HOSTETLER LLP**

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/s/ Frank G. Cawley

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***ATTORNEYS FOR DEFENDANTS***

**CERTIFICATE OF SERVICE**

Pursuant to Northern District of Texas local rules, I hereby certify that on September 27, 2023, a true and correct copy of the foregoing was served upon all counsel of record via the court's electronic filing system.

/s/ L. David Anderson

L. David Anderson